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Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Amendment of Part 90 of the)
Commission's Rules to Adopt)
Regulations for Automatic)
Vehicle Monitoring Systems)

PR Docket No. 93-61

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EX PARTE COMMENTS OF THE ASSOCIATION

OF

SCHOOL BUSINESS OFFICIALS INTERNATIONAL

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December 2, 1994

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To: The Commission

**EX PARTE COMMENTS OF THE ASSOCIATION OF
SCHOOL BUSINESS OFFICIALS INTERNATIONAL**

The Association of School Business Officials International (ASBO) respectfully submits its comments in response to the Federal Communications Commission's (Commission) PR Docket No. 93-61. These comments underscore ASBO's concerns with the Commission's proposal and the latter's potential impact on the ability of local school districts to enhance the delivery of educational services, especially the connection of every classroom to a national information super highway. The Commission's decision definitely will affect the delivery of educational services to almost 50 million students (K through 8, 31.8 million; 9 through 12, 12.4 million; private schools, 5.6 million).

At issue in the Commission's proposed permanent rules for Automatic Vehicle Monitoring (AVM) systems. These systems have been authorized under interim rule provisions adopted in 1974, but only a limited version, narrowband tag readers, has been developed with any market success.

Introduction

ASBO, headquartered in Reston, Virginia, is an international professional association of over 6,000 public and private school business administrators. ASBO has members in all 50 States, 12 Canadian provinces, and in a number of foreign countries.

**The Commission's Proposed Rule Will Deny
Many Schools Access to the Information Super Highway**

The bulk of the 85,578 (both public and private, K-12) schools in the United States are not wired to benefit from the national information super highway. While most schools do have telephones in the principal's offices and some schools do have telephones in other administrative offices, only very recently retrofitted schools are wired for classroom computers. Wireless communications technology offers an attractive solution to reduce the costs of wiring entire schools and, more importantly, to avoid potential asbestos problems that bring unknown difficulties and perhaps,

insurmountable costs. Wireless computer networks operate on the 902-928 MHz band. School business administrators, who are the chief financial officers, are now hesitant to recommend further planning, expenditures of taxpayers money, and reliance on wireless computer networks until the Commission makes a decision in this docket that assures the continued viability of this important Part 15 technology.

The Commission's Proposal Is at Odds with Policies of the Clinton Administration

ASBO agrees with President Clinton's statement in his January 25, 1994 *State of the Union Address* when he said:

"And the Vice President is right -- we must also work with the private sector to connect every classroom, every clinic, every library, every hospital in America into a national information super highway by the year 2000."

The Commission's decision in this docket will have a direct bearing on whether schools reach President Clinton and Vice President Gore's goal. If the Commission denies reliable operations of wireless computer networks in the 902-928 MHz band, then the costs of connecting and using the information super highway becomes high and many of the nation's schools will be excluded. The Commission's decision in this docket will have a major influence on the capabilities of teachers to prepare students in the future.

Within the classroom, these technologies give students the opportunity to learn in more creative, productive ways, through peer work groups and exchanges with teachers. These devices also have the capability of making any school classroom into a video conferencing center or studio. Lectures, experiments, and other live graphic instruction can be broadcast throughout a building over wireless links. These have the advantage of low cost of acquisition, immediate deployability, and unlimited mobility without licensing requirements.

Potential Impact of Super Information Highway on Schools

ASBO believes that the most cost-effective method to give every child the opportunity to learn, is to provide access to the technology infrastructure that surrounds us. Our members recognize the benefits of integrating CD-ROM's, videodiscs, computers, multimedia, televisions, and telephones transmission lines to deliver a broader array of educational services. The new electronic media will enhance a shared cultural heritage, new methods to organize schools, and an improvement in the interaction between students and staff. The information super highway can allow students from inner cities and rural areas to take interactive science, mathematics, and language courses from outstanding teachers anywhere in the nation. But this may not happen soon, or perhaps never in some schools, if the schools are denied the use of wireless computer networks.

The Asbestos Factor

Schools built before personal computers simply do not have the necessary telephone wiring to

support these computers and, subsequently, the information super highway. The private sector, primarily telephone and cable companies, are building the infrastructure that will allow schools the connecting of schools to the information super highway. ASBO's members recognize the cost and complexity of building the last few feet of this highway to the classrooms.

One major problem that may delay or obstruct the building of the highway to every classroom is the presence of asbestos in older schools and the cost to contain asbestos when drilling into the walls to connect wires. The costs of asbestos containment is very much a factor in deciding whether to wire a school. The National School Boards Association estimated in 1990 that asbestos containment would cost schools approximately \$6 billion. The cost to link schools with asbestos to the information super highway can be greatly reduced provided the option of wireless computer networks is available.

Wireless computer networks that use the 902-928 MHz band provide an attractive alternative to avoid the asbestos problem with its added costs and to bring the information super highway to every classroom.

Conclusion

The Commission's policy choice of where to locate service such as AVM is a public interest determination that must weigh the benefits and detriments to the nation's schools in an evenhanded fashion. The Commission must not act on AVM technology without considering the impact on emerging technologies that can benefit every student.

Public education is a key component of our society and this nation's investment in public education is already large. The location of AVM's in the same frequency band in such a manner to render as useless the installation of wireless computer networks in schools will be a costly blow to local school systems and a setback for education. ASBO urges the Commission to consider student education when deciding the future of the 902-928 MHz band.

The Association of School Business Officials International respectfully requests the Commission to abandon its proposal in this proceeding or, in the alternative, to assure education administrators of the uninterrupted and reliable operation of wireless computer networks.

Respectfully submitted,

THE ASSOCIATION OF SCHOOL BUSINESS OFFICIALS INTERNATIONAL

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